

**United States Bankruptcy Court
Northern District of Illinois
Eastern Division**

In Re: Conrado River)	
)	Chapter 13
Debtor)	Judge David Cleary
)	Case # 17-22015

NOTICE OF MOTION

PLEASE TAKE NOTICE that on ,March 29,2021, at 9:00 am, I will appear before the Honorable Cleary, or any judge sitting in that judge's place, and present the motion of the debtor to waive filing of debtor education and Domestic Support affidavit., a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. Meeting ID: 161 122 6457

Passcode: Cleary644

The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: /S/Joseph C. Michelotti 6185760
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CERTIFICATE OF SERVICE

I, Joseph C. Michelotti, certify under the laws of the United States of America that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on March 17, 2021.

ECF

Patrcik Layng US Trustee

Marilyn Marshall, CH 13 Trustee

Regular Mail

BANK OF AMERICA
POBOX 17054
WILMINGTON, DE 19884

BARCLAY BANK / CARNIVAL
125 WEST ST.
WILMINGTON, DE 19801

CAPITAL ONE
90 CHRISTIANA
NEW CASTLE, DE 19720

CHASE MORTGAGE
POB 2854
SACRAMENTO, CA 92403

DISCOVER CARD
POB 6103
CAROL STREAM, IL 60197

**United States Bankruptcy Court
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In Re: Conrado River)	
)	Chapter 13
Debtor)	Judge David Cleary
)	Case # 17-22015

**MOTION TO WAIVE DEBTOR'S REQUIREMENT TO COMPLETE AN
INSTRUCTIONAL COURSE IN PERSONAL FINANCIAL MANAGEMENT AND
DECLARATION REGARDING DOMESTIC SUPPORT OBLIGATIONS**

Now comes Counsel for Conrado Rivera, Joseph Michelotti of Michelotti & Associates, Ltd. and respectfully states:

1. That the court has jurisdiction over this matter pursuant to 28 U.S.C. 1334 and it is a "core proceeding" under 28 U.S.C. § 157(b).
2. That the Debtor filed for protection under Chapter 13 of the United States Bankruptcy Code on July 24, 2017.
3. Prior to the case being filed, the Debtor completed his credit counseling briefing, as required under 11 U.S.C. § 109(h)(4).
4. The Court confirmed the plan of reorganization on January 29, 2018.
5. That on February 26, 2021, prior to completing his second credit counseling course as required by 11 U.S.C. §§ 111, 1328(g)(1), the Debtor passed away.
6. Since he is deceased, Mr. Rivera is unable to complete his instructional course in personal financial management pursuant to 11 U.S.C. §§ 111, 1328(g)(1) or his declaration regarding domestic support obligations.

WHEREFORE, Debtors respectfully request that this Court enter an order waiving the requirement that the Debtor complete an instructional course in personal financial management and the requirement that Debtor complete a declaration regarding domestic support obligations.

Respectfully Submitted,

/S/Joseph C. Michelotti

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